

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

FILED

JAN 29 2019

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

UNITED STATES OF AMERICA,)
Plaintiff,)
)
v.)
)
BENJAMIN DAVID BROOKS,)
Defendant.)

Case No. 2:97-CR-0136-2
Before Hon. Donetta W. Ambrose

**MOTION TO TERMINATE DEFENDANT'S
SUPERVISED RELEASE TERM**

NOW COMES the Defendant BENJAMIN DAVID BROOKS, appearing *pro se*, and respectfully motions the Court to terminate the imposed term of supervised release pursuant to 18 U.S.C. §3583(e)(1) and Fed R. Crim. P. 32.1(c)(2)(C). No hearing is sought in this matter per Fed R. Crim. P. 32.1(c)(2)(B).

Argument Summary: Section 3583(e) allows Article III judges to terminate a term of supervised release if it is in the interest of justice and warranted by the defendant's conduct. This petition deserves to be granted because:

- The goals of supervision have been reached, the need for further supervision is no longer needed and the interests of justice are served by granting this request;
- I am being supervised by judgments in two separate, co-occurring supervised release terms, and wish to terminate both, beginning with this, the older of the two cases;
- I meet the §3553(a) criteria for this termination to be in the interests of justice;
- I am almost zero risk to re-offend for the remainder of my life; and,
- Similar defendants from this district, with similar cases, have had their petitions for early termination granted.

2/20/19

The Motion is granted.

Donetta W. Ambrose